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 7 State Farm Mutual Automobile Insurance Company

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10	RICHARD I. DREITZER, an individual,	CASE NO.: 2:24-CV-00093
11	Plaintiff,	
12	vs.	STIPULATION AND [PROPOSED]
13	STATE FARM MUTUAL AUTOMOBILE	ORDER TO REMAND
14	INSURANCE COMPANY, a foreign	
15	corporation; MCKAYLA SHANNON WEST, an	
16	individual; DOES I through X, and	
17	ROE BUSINESS ENTITIES I through X,	
	inclusive,	
	Defendants.	

18
 19 Defendant, STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY
 20 (“Defendant”), by and through counsel of record, Renee M. Finch, Esq., of the law firm MESSNER
 21 REEVES LLP, and Plaintiff RICHARD I. DREITZER (“Plaintiff”), by and through counsel of record,
 22 Donald P. Paradiso, Esq., of the law firm LADAH LAW FIRM, hereby stipulate and agree as follows:

- 23 1. On November 21, 2023, Plaintiff filed his Complaint against Defendant in the Eighth
 24 Judicial District Court, County of Clark, State of Nevada, Case Number **A-23-882017-C**.
 25 2. On January 11, 2024, Defendant removed this matter to this Court from the Eighth
 26 Judicial District Court, County of Clark, State of Nevada, where it was pending under Case Number
 27 **A-23-882017-C**.
 28



3. Upon discussion between counsel for the parties, the parties hereby agree to remand this matter back to the Eighth Judicial District Court, County of Clark, State of Nevada, under Case Number **A-23-882017-C**.

4. The parties further stipulate and agree that each party shall bear its own attorneys' fees and costs incurred with respect to and/or as a result of the removal and subsequent remand of this action pursuant to this Stipulation and Order.

DATED this 18th day of January 2024.

DATED this 18th day of January 2024.

MESSNER REEVES LLP

LADAH LAW FIRM

/s/ Renee M. Finch

/s/ Donald P. Paradiso

M. CALEB MEYER, ESQ.

RAMZY PAUL LADAH, ESQ.

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Las Vegas, Nevada 89101

*Attorneys for Defendant State Farm Mutual
Automobile Insurance Company*

Attorneys for Plaintiff

IT IS SO ORDERED.

DATED this 22 day of January, 2024.


UNITED STATES DISTRICT COURT JUDGE



From: [Donald Paradiso](#)
To: [Megan Wessel](#)
Cc: [Rhonda Onorato](#); [Kim Shonfeld](#); [Renee Finch](#)
Subject: Re: Dreitzer v State Farm
Date: Thursday, January 18, 2024 3:58:52 PM

[**EXTERNAL EMAIL**]

Thank you, you may apply my e-signature.

From: Megan Wessel <MWessel@messner.com>
Sent: Thursday, January 18, 2024 3:42:09 PM
To: Donald Paradiso <Donald@ladahlaw.com>
Cc: Rhonda Onorato <RONorato@messner.com>; Kim Shonfeld <kshonfeld@messner.com>; Renee Finch <rfinch@messner.com>
Subject: RE: Dreitzer v State Farm

Thank you, Don. I have attached the proposed SAO for your review. Please let us know if we may affix your e-signature and file.

MEGAN WESSEL

Attorney

Messner Reeves LLP

O: 702.363.5100 **E:** mwessel@messner.com

8945 W. Russell Road, Suite 300, Las Vegas, NV 89148

From: Donald Paradiso <Donald@ladahlaw.com>
Sent: Thursday, January 18, 2024 1:28 PM
To: Megan Wessel <MWessel@messner.com>
Cc: Rhonda Onorato <RONorato@messner.com>; Kim Shonfeld <kshonfeld@messner.com>; Renee Finch <rfinch@messner.com>
Subject: RE: Dreitzer v State Farm

[**EXTERNAL EMAIL**]

Hi Megan – Thank you for catching this. Yes, we will stipulate to remand the case back to the EJDC. Please including in the stipulation that each party will bear their own fees and costs.

I will review and approve my e-sig.

Thank you!

Donald P. Paradiso, Esq.



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From: Megan Wessel <MWessel@messner.com>

Sent: Thursday, January 18, 2024 12:29 PM

To: Donald Paradiso <Donald@ladahlaw.com>

Cc: Rhonda Onorato <ROnorato@messner.com>; Kim Shonfeld <kshonfeld@messner.com>; Renee Finch <rfinch@messner.com>

Subject: Dreitzer v State Farm

Hi Don,

I just left a voicemail for you on this one. It looks like this matter was removed but I see there is a resident Defendant. The court indicated a stipulation to remand would suffice to move this back. Please let me know if you are on board with that plan and I will draft the SAO asap. I appreciate it in advance.

Thank you,
Megan

MEGAN WESSEL

Attorney

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